

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

W. R. GRACE & CO., et al.,<sup>1</sup>

Reorganized Debtors.

)  
) Chapter 11  
)  
) Case No. 01-01139 (KJC)  
) (Jointly Administered)  
)  
) **Hearing Date: August 26, 2015 at 12:00 pm ET**  
) **Objection Deadline: August 26, 2015 at 12:00 pm ET**  
)  
) **Related to Docket Nos. 32600, 32601, 32603, 32608,**  
) **32609, 32610, 32611, 32612, & 32614**

**STIPULATION: (I) EXTENDING THE RESPONSE DEADLINE OF SGH  
ENTERPRISES, INC. REGARDING REORGANIZED DEBTORS' THIRTY EIGHTH  
OMNIBUS OBJECTION TO CLAIM, AND (II) ABATING INTEREST, AND (III)  
CONTINUING THE HEARING WITH RESPECT THERETO**

The above-captioned Reorganized Debtors and SGH Enterprises, Inc. (f/k/a Samson Hydrocarbons, Inc.) ("SGH"), through their respective undersigned counsel, hereby agree and stipulate as follows with respect to the response deadline and initial hearing date thereon for the "*Thirty- Eighth Omnibus Objection to Claims filed by SGH Enterprises, Inc. (Substantive and Non- Substantive Objection)*" [Docket No. 32600] (the "Objection") and the "*Declaration of Richard C. Finke in Support of the Thirty- Eighth Omnibus Objection to Claims filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)*" [Docket No. 32601] (collectively with the Objection, the "Claim Objection") filed by Reorganized Debtors on August 18, 2015:

1. The deadline for SGH to file and serve a response, answer or objection to the Claim Objection is extended through and including October 19, 2015.
2. The initial scheduling hearing with respect to the Claim Objection set for September 23, 2015, shall be continued until a mutually agreeable date after October 19, 2015.

---

<sup>1</sup> The Reorganized Debtors are W. R. Grace & Co. and W. R. Grace & Co.-Conn.

3. SGH will forego interest accruing pursuant to the Plan on the Allowed amount (if any) of a Claim allowed to SGH (if any) in the above-captioned chapter 11 cases that would otherwise accrue between September 4, 2015, and the date that SGH actually files its response to the Claim Objection.<sup>2</sup>

Dated: August 26, 2015  
Wilmington, Delaware

*/s/ Domenic E. Pacitti*

---

Domenic E. Pacitti (DE Bar No. 3989)

**KLEHR HARRISON HARVEY  
BRANZBURG LLP**

919 N. Market Street, Suite 1000  
Wilmington, Delaware 19801

Telephone: (302) 426-1189

Facsimile: (302) 426-9193

- and -

Morton Branzburg (admitted *pro hac vice*)

**KLEHR HARRISON HARVEY  
BRANZBURG LLP**

1835 Market Street, Suite 1400  
Philadelphia, Pennsylvania 19103

Telephone: (215) 569-3007

Facsimile: (215) 568-6603

David L. Swanson

Gregory Lowry

Texas Bar No. 12641360

LOCKE LORD, LLP

2200 Ross Avenue, Suite 2200

Dallas, Texas 75201-6776

Telephone: (214) 740-8000

Facsimile: (214) 740-8800

**CO- COUNSEL FOR SGH ENTERPRISES, INC.  
(F/K/A SAMSON HYDROCARBONS COMPANY)**

---

<sup>2</sup> Capitalized terms not defined in this stipulation shall have the meaning ascribed to them in the *First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W.R. Grace & Co., et al, the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants' Representative and the Official Committee of Equity Security Holders as Modified Through December 23, 2010* [Docket No. 26368] (the "Plan").

/s/ James E. O'Neill

PACHULSKI STANG ZIEHL & JONES LLP

Laura Davis Jones (Bar No. 2436)

James E. O'Neill (Bar No. 4042)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705

(302) 652-4100

(302) 652-4400

-and-

THE LAW OFFICES OF ROGER HIGGINS, LLC

Roger J. Higgins

1 North Bishop Street

Suite 14

Chicago, IL 60607-1823

(312) 666-0431

**CO-COUNSEL FOR THE REORGANIZED  
DEBTORS**